

STEVEN W. MYHRE (NSBN 9635)  
Acting United States Attorney  
District of Nevada  
TINA NAICKER, CSBN 252766  
Special Assistant United States Attorney  
160 Spear Street, Suite 800  
San Francisco, California 94105  
Telephone: (415) 268-5611  
Facsimile: (415) 744-0134  
E-Mail: Tina.Naicker@SSA.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SHERMAINE CARROLL,

Plaintiff,

v.

NANCY A. BERRYHILL,  
Acting Commissioner of Social Security,

Defendant.

Case No. 2:17-cv-02237-MMD-PAL

**JOINT STIPULATION AND [PROPOSED]  
ORDER FOR EXTENSION OF TIME TO  
RESPOND TO PLAINTIFF'S MOTION FOR  
REVERSAL OR REMAND**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Reversal and/or Remand be extended for thirty days from January 2, 2018 to **February 2, 2018**. This is Defendant's first request for extension. Good cause exists to grant Defendant's request for extension. Counsel for Defendant was out sick with the flu and was subsequently on leave for the holidays. Due to shortened staff and heavy workload, Counsel for Defendant has over 65 active pending Social Security matters, of which require 2+ responses to dispositive motions per week until early-March. As such, Counsel needs additional time

1 to adequately review the transcript and properly respond to Plaintiff's Motion for Reversal and/or  
2 Remand. Defendant makes this request in good faith with no intention to unduly delay the  
3 proceedings. The parties further stipulate that the Court's Scheduling Order shall be modified  
4 accordingly.  
5

6  
7 Respectfully submitted,  
8

9 Dated: December 28, 2017

/s/ \*Cyrus Safa  
(\*as authorized by email on December 28, 2017)  
CYRUS SAFA  
Attorney for Plaintiff

12  
13 Dated: December 28, 2017

STEVEN W. MYHRE  
Acting United States Attorney  
DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
Social Security Administration

14  
15  
16  
17 By /s/ Tina L. Naicker  
18 TINA L. NAICKER  
19 Special Assistant U.S. Attorney  
Attorneys for Defendant

20 **ORDER**

21 APPROVED AND SO ORDERED:  
22

23  
24 DATED: January 5, 2018

  
THE HONORABLE PEGGY A. LEEN  
UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 I, TINA L. NAICKER, certify that the following individual was served with a copy of the  
3 **JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO**  
4 **RESPOND TO PLAINTIFF'S MOTION FOR REVERSAL OR REMAND** on the date and via  
5 the method of service identified below:

6 **CM/ECF:**

7  
8 Cyrus Safa  
9 Law Offices of Lawrence D. Rohlfinding  
10 12631 E. Imperial Highway, Suite C-115  
11 Santa Fe Springs, CA 90670  
12 562-868-5886  
13 Fax: 562-868-5491  
14 Email: cyrus.safa@rohlfindinglaw.com

15  
16 Gerald Welt  
17 Gerald M. Welt, Chtd.  
18 703 S. 8th St.  
19 Las Vegas, NV 89101  
20 702-382-2030  
21 Fax: 702-684-5157  
22 Email: gmwesq@weltlaw.com

23 Attorneys for Plaintiff

24  
25 Respectfully submitted this 28th day of December 2017,  
26

\_\_\_\_\_  
/s/ Tina L. Naicker  
TINA L. NAICKER  
Special Assistant United States Attorney